REMARKS/ARGUMENTS

· The Examiner rejected claims 1-43 as anticipated (35 U.S.C. §102(e)) by Elliot (U.S. Pub. No. 2004/0162137). Applicants traverse for the following reasons.

Claims 1, 18, and 27 concern enabling access to data in a storage medium within one of a plurality of storage cartridges capable of being mounted into a interface device, and require providing an association of at least one coding key to a plurality of storage cartridges; determining one coding key associated with one target storage cartridge, wherein the coding key is capable of being used to access data in the storage medium within the target storage cartridge; and encrypting the determined coding key, wherein the coding key is decrypted to use to decode and code data stored in the storage medium.

Applicants amended claims 1 and 27 to correct a grammatical mistake, changing "a" to "an" in the preamble.

The Examiner cited paragraphs 5, 15-18, 80, 109, 160, 164-168, 176-178, 183, and 184 of Elliot as disclosing the requirements of these claims. (Office Action, pg. 3) Applicants traverse.

Paragraph 5 discusses counterfeiting of video game cartridges for video game systems. Paragraphs 15-18 discuss how an expansion device may be attached to a video game console, where the expansion device has a storage device and unique ID associated with the storage device. The expansion device requests a server to download a video game. The expansion device and server communicate using encryption keys.

Cited paragraph 18 discusses how the server utilizes the unique ID of the expansion device hard drive and encryption keys to encrypt a downloaded game. The server also identifies to a disk controller in an expansion device the partitions a particular game may access.

Cited paragraphs 168 and 184 mention that the expansion device sends the unique ID of its hard drive encrypted to the server. The server uses the unique ID to encrypt the video game. The video game system receives the game, and the game is decrypted and executed and stored in encrypted form on the hard drive.

The claims concern enabling access to storage cartridges capable of being mounted to an interface device. The cited Elliot discusses a unique ID associated with a hard disk drive in an expansion device. There is no disclosure in the cited Elliot that the interface of the hard disk drive in the expansion device may mount multiple storage cartridges. Elliot discusses game cartridges, but the cited unique ID sent to the server and used to encrypt the video game is not

associated with the game cartridges, but instead the disk drive of the expansion device attached to the game console.

The claims further require that the coding key is capable of being used to access data in the storage medium within the target storage cartridge with which the coding key is associated. In the cited Elliot, the unique ID of the expansion device hard disk drive is used by the server to transmit a video game to the expansion device. However, there is no disclosure in the cited Elliot that this same cited unique ID is also used to access data in the storage medium within the target storage cartridge as claimed. The cited paragraph 168 mentions that the game is stored in encrypted form on the hard drive 206. However, the cited Elliot does not disclose that the unique ID is also used to access data within the storage media as claim. The cited Elliot does not disclose the use of the unique ID for encryption other than encrypting the video game to communicate from the server to the expansion device.

The claims also require that the coding key is decrypted to use to decode and code data stored in the storage medium. The cited Elliot discusses how the server uses the unique ID for the hard disk drive to encrypt the game to send, but nowhere discloses the claim requirement that the unique ID is used to decode and code data stored in the storage medium.

Accordingly, for the above reasons, Applicants submit that the independent claims 1, 18, and 27 are patentable over the cited art because the cited Elliot does not disclose all the claim requirements.

Claims 2-9, 19-22, and 28-35 are patentable over the cited art because they depend from one of claims 1, 18, and 27, which are patentable over the cited art for the reasons discussed above. Moreover, the below discussed independent claims provide additional grounds of patentability over the cited art.

Claims 2, 19, and 28 depend from claims 1, 18, and 27 and further require using the coding key to encode data to write to the storage medium; transmitting the encoded data to the interface device to write to the storage medium in one storage cartridge mounted in the interface device; receiving encoded data from the interface device read from the storage medium; and using the coding key to decrypt the received encoded data. The Examiner cited the same above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 3) Applicants traverse.

As discussed, the cited Elliot does not disclose that the coding key is used to encode data to write to the storage medium nor decrypt data in the storage medium. Instead, the cited Elliot

mentions that the unique ID is used by the server to encrypt the program being transmitted to the expansion device. There is no disclosure this unique ID is used to encode data written to the storage device. Further, there is no disclosure that the unique ID is used to decrypt data in the storage medium. Instead, the cited Elliot mentions that the unique ID is used by the server to encrypt the game sent to the expansion device. Applicants submit that the Examiner has not cited any part of Elliot that discloses that this same unique ID is used to code and decrypt data written to the storage medium, which corresponds to the cited hard drive of the expansion device.

Accordingly, claims 2, 19, and 28 provide additional grounds of patentability over the cited art.

Claims 3, 20, and 29 depend from claims 1, 18, and 27 and further require that the association of the at least one coding key to the plurality of storage cartridges associates one key with the plurality of storage cartridges, wherein the one key is capable of being used to encode data written to the storage mediums and decode data read from the storage mediums of the plurality of storage cartridges. The Examiner cited the same above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 3) Applicants traverse.

Applicants amended these claims to correct a grammatical mistake changing "medium" to plural "mediums", and changing "storage devices" to "storage cartridges".

The cited Elliot discusses how there is one unique ID per disk drive in the expansion device. These dependent claims require that there is one key associated with a plurality of storage cartridges, and that this one key is capable of being used to encode and decode data in the plurality of storage cartridges. The cited Eliot does not disclose that the unique ID can be used to decode and code data for multiple storage devices, such as hard disk drives in multiple expansion devices. In fact, Elliot teaches away from this requirement because in the cited Elliot the unique ID is "unique" to one hard disk drive in one expansion device.

Accordingly, claims 3, 20, and 29 provide additional grounds of patentability over the cited art.

Claims 5 and 31 depend from claims 1 and 27 and further require that the coding key comprises a seed value that is used to generate an additional key that is used to directly decode and encode the data in the storage medium in the storage cartridge. The Examiner cited the same

above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 4) Applicants traverse.

The cited Elliot discusses how a server uses a unique ID of an expansion device disk drive to send an encrypted game to the expansion device. Nowhere does the cited Elliot disclose that the unique ID comprises a seed value used to generate an additional key. Applicants request that the Examiner specifically identify where Elliot discloses that the unique ID associated with the expansion device disk drive may be used as a seed value used to generate an additional key used to directly decode and encode data in the cartridge.

Accordingly, claims 5 and 31 provide additional grounds of patentability over the cited art.

Claims 6, 22, and 32 depend from claims 1, 18, and 27 and further require transmitting the encrypted coding key to the interface device, wherein the interface device decrypts the coding key to use to decode and code data stored in the storage medium. The Examiner cited the same above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 4) Applicants traverse.

As discussed, the cited Elliot discusses how the expansion device sends the server the encrypted unique ID, where the server uses the unique ID to encrypt the video game being sent to the expansion device. However, nowhere does the cited Elliot disclose the claim requirement of decrypting the coding key to use to decode and code data stored in the storage medium. There is no mention in the cited Elliot that the server or any other component uses the cited unique ID to code and decode data in the storage medium. Instead, the cited Elliot mentions the use of the unique ID to "ensure secure communications between the expansion device and the server." (Elliot, par. 176).

Accordingly, claims 6, 22, and 32 provide additional grounds of patentability over the cited art.

Claims 8 and 34 depend from claims 6 and 32 and provide details of how the coding key is encrypted with a first key and that another key used to decrypt a second key capable of decrypting the encrypted coding key. The Examiner cited the same above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 4) Applicants traverse.

The cited Elliot mentions that the unique ID may be encrypted and sent to the server. However, nowhere does the cited Elliot anywhere disclose encrypting and transmitting a second key used to decrypt the unique ID.

Accordingly, claims 8 and 34 provide additional grounds of patentability over the cited art.

Claims 9 and 35 depend from claims 6 and 32 and provide details of how the coding key is encrypted with a first key, then decrypted by a second key, and then encrypted with a fourth key. The Examiner cited the same above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 5) Applicants traverse.

The cited Elliot mentions that the unique ID may be encrypted and sent to the server. However, nowhere does the cited Elliot anywhere disclose encrypting the unique ID with a first key, decrypting with a second and then encrypting with a third key that may be decrypted by a fourth key.

Accordingly, claims 9 and 35 provide additional grounds of patentability over the cited art.

Independent claims 10, 23, and 36 concern accessing data in a removable storage cartridge including a storage medium, and require: receiving an encrypted coding key from a host system; decrypting the encrypted coding key; using the coding key to encode data to write to the storage medium; and using the coding key to decode data written to the storage medium. The Examiner cited the same above cited paragraphs of Elliot as disclosing the additional requirements of these claims. (Office Action, pg. 3) Applicants traverse.

As discussed, the cited Elliot discusses how the expansion device sends an encrypted unique ID associated with a hard drive to the server, and the server encrypts and sends a video game back. Nowhere does the cited Elliot disclose encrypting an encrypted coded key received from a host to encode and decode data written to a storage medium. Instead, the cited Elliot discusses the server decrypting an encrypted unique ID to use to encrypt a video game. However, the Examiner has not cited any part of Elliot that discloses that the decrypted unique ID is used to encode and decode data in the storage medium as claimed.

Moreover, the cited Elliot concerns a unique ID that is used to encrypt data for a hard disk drive, not a removable storage cartridge as claimed.

Accordingly, for the above reasons, Applicants submit that the independent claims 10, 23, and 36 are patentable over the cited art because the cited Elliot does not disclose all the claim requirements.

Claims 11-17, 24-26, and 37-43 are patentable over the cited art because they depend from claims 10, 23, and 36, which are patentable over the cited art for the reasons discussed above. Moreover, the dependent claims provide additional details about how the coding key may be encrypted and decrypted. The cited Elliot does not disclose the additional requirements of the dependent claims with respect to how the server and expansion device communicate the unique ID that the server uses to encrypt the video game being sent. Accordingly, these dependent claims provide further grounds of patentability over the cited art.
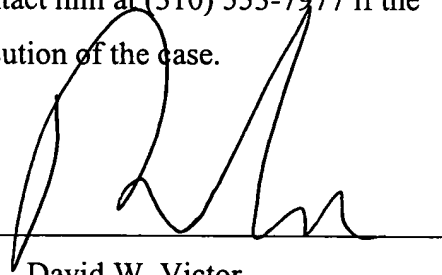
Conclusion

For all the above reasons, Applicant submits that the pending claims 1-43 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0466.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: February 16, 2005   By:_____

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